

Brock Fredin

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Date: January 3, 2022

BY ECF

Susan Richard Nelson
United States District Court
316 Robert St N
Saint Paul, MN 55101

Re: Fredin v. Miller et al., Case No. 18-CV-466-SRN-HB
Fredin v. Middlecamp, Case No. 17-CV-3058-SRN-HB
Fredin v. Kreil, Case No. 20-CV-01928-SRN-HB

Dear Judge Nelson:

I write this letter to the Court seeking an extension to file a response to Defendants December 16, 2021 show cause motion.

Unfortunately, Defendants waited until today to file a supplemental brief in an effort to jam new arguments without providing me an adequate window to respond. This obsessive pattern of ramming supplemental briefs and declarations at the last minute is highly prejudicial.

Furthermore, this pattern of attempting to ram attorney argument in at the last minute requires me to draft a response that includes additional sanctions against Defendants and their counsel. This will require an extension to research and draft an appropriate response.

In addition, I am also requesting that the Court issue an Order precluding Defendants from continuing to engage in this pattern of raising new supplemental briefs or declarations at the last minute without giving me a proper response window unless given prior leave of the Court.

In light of these facts, I should be given an opportunity to respond to Defendants supplemental memorandum. I am respectfully requesting an extension.

Sincerely,



s/ Brock Fredin
Brock Fredin

cc: Karl Johann Breyer (by ECF)
cc: Anne M. Lockner (by ECF)